

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

dui a

MEMORANDUM

Date:

November 7, 2017

Subject:

Efficacy Review for Project Flash Spray, EPA File Symbol 9480-RU

Kristen William

(DP Barcode: 440588)

From:

Alison Clune

Efficacy Evaluation Team Product Science Branch

Antimicrobials Division (7510P)

Thru:

Kristen Willis, Acting Team Leader

Product Science Branch

Antimicrobials Division (7510P)

To:

Zeno Bain, PM 33 / Terria Northern

Regulatory Management Branch I Antimicrobials Division (7510P)

Applicant:

Professional Disposables International, Inc.

100 Philips Parkway Montvale, NJ 07645

Formulation from the Label:

Active Ingredient(s)	% by wt.
Hydrogen peroxide	4.04%
Other Ingredients	95.96%
Total	100.00%

BACKGROUND

Product Description (as packaged, as applied): Trigger spray

Submission type: New product

Requested efficacy claim(s): one-step hospital disinfectant (bactericidal, virucidal, fungicidal, tuberculocidal, sporicidal against *Clostridium difficile*); emerging viral pathogens claims against enveloped, large non-enveloped, and small non-enveloped viruses.

Documents considered in this review:

- 2 letters from applicant to EPA dated May 9, 2017 and July 17, 2017
- Proposed label PDI/9480-XX/labels/2017/9480-XX label 041817.doc, dated April 26, 2017
- 47 efficacy studies (MRID 50282509-50282555)
- Proposed Basic Confidential Statement of Formula (EPA Form 8670-4) dated 04/26/2017.

II PROPOSED DIRECTIONS FOR USE

"TO DISINFECT [CLEAN] [AND DEODORIZE]: Spray [product name] 6-8 inches from surface until thoroughly wet. Allow surface to remain [wet] [treated] for one (1) minute. For [Clostridium difficile] [C. difficile] spores, allow to remain [wet] [treated] for five (5) minutes. Let air dry [or wipe excess liquid using a towel]. [A potable water rinse is required for food contact surfaces.] If present, remove [gross filth] [and] [heavy] [soil loads] prior to disinfecting. A precleaning step is required to kill [Clostridium difficile] [or C. difficile] spores and Mycobacterium bovis BCG (TB)."

III STUDY SUMMARIES

Note: Three sprays of the product were applied to the inoculated surface in all 5 minute studies, while four sprays were applied to the inoculated surface in all 1 minute studies (except virus studies).

1.	MRID	50282509	Study Comp	letion D	ate:	11/21/	16			
Test organis ⊠ 1 □ 2 □ 3		Staphylococcus aureus (ATCC 6538)								
Test Method		AOAC Germic	idal Spray Meth	od						
Application I	Method	Spray								
Test	Name/ID	Project Flash	Project Flash (identical to Project Flash Spray)							
Substance Preparation	Lots ☐ 1 ⊠ 2 ☐ 3 Preparation	PDI-0061-LO-938-148A PDI-0061-LO-938-148C Ready to Use at LCL								
Soil load		5% Fetal Bovine Serum								
Carrier type,	# per lot	Glass slides, 6	60							
Test condition	ons	Contact time	1 minute	Temp	21°C	RH	43%			
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A209	71						
Reviewer con (i.e. protocol of amendments, control failure etc.)	deviations and retesting,	None								

2.	MRID	50282510	Study Comp	letion D	ate:	9/9/16				
Test organis ⊠ 1 □ 2 □ 3	맛이 가게 맛있습니다. 그 때문에 그게 얼마나는 때가 되어 하네	Staphylococcus aureus (ATCC 6538)								
Test Method		AOAC Germi	cidal Spray Meth	nod						
Application I	Viethod	Spray				2000	7			
Test	Name/ID	Project Flash	Project Flash (identical to Project Flash Spray)							
Substance Preparation	Lots ☐ 1 ☐ 2 ⊠ 3 Preparation	PDI-0061-LO- PDI-0061-LO- PDI-0061-LO- Ready to Use	-938-112-A2 -938-112-A3							
Soil load		5% Fetal Bovine Serum								
Carrier type,	# per lot	Glass slides,	60							
Test condition		Contact time	5 minutes	Temp	21.9°C	RH	18%			
Testing Lab,	Lab Study ID	Accuratus Lal	Services, A19	366						
amendments,	deviations and	None								

3.	MRID	50282511	Study Con	pletion	Date:	9/9/1	6			
Test organis ⊠ 1 □ 2 □ 3		Pseudomonas aeruginosa (ATCC 15442)								
Test Method		AOAC Germ	icidal Spray M	ethod						
Application I	Method	Spray								
Test	Name/ID	Project Flash	Project Flash (identical to Project Flash Spray)							
Substance Preparation	Lots ☐ 1 ☐ 2 ☒ 3	PDI-0061-LC PDI-0061-LC	PDI-0061-LO-938-112-A1 PDI-0061-LO-938-112-A2 PDI-0061-LO-938-112-A3							
	Preparation	Ready to Use at LCL								
Soil load		5% Fetal Bovine Serum								
Carrier type,	# per lot	Glass slides, 60								
Test condition	ons	Contact time	5 minutes	Temp	20.37°C	RH	20.84%			
Testing Lab,	Lab Study ID	Accuratus La	ab Services, A	19665						
amendments,	deviations and	None								

4.	MRID	50282512	Study Com	oletion D	ate:	11/21/	16		
Test organis ⊠ 1 □ 2 □ 3		Pseudomonas aeruginosa (ATCC 15442)							
Test Method		AOAC Germi	cidal Spray Met	nod					
Application I	Method	Spray							
Test	Name/ID	Project Flash	(identical to Pro	ject Flasi	h Spray)			
Substance Preparation	Lots ☐ 1 ⊠ 2 ☐ 3 Preparation	PDI-0061-LO-938-148A PDI-0061-LO-938-148C Ready to Use at LCL							
Soil load		5% Fetal Bovine Serum							
Carrier type,	# per lot	Glass slides, 60							
Test condition	ns	Contact time	1 minute	Temp	20°C	RH	46%		
Testing Lab,	Lab Study ID	Accuratus Lal	Services, A20	970					
Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, neutralizer, etc.) None							iii 1512		

5.	MRID	50282513	Study Con	pletion	Date:	9/9/1	6		
Test organis 図 1 □ 2 □ 3		Salmonella enterica (ATCC 10708)							
Test Method		AOAC Germio	idal Spray M	ethod					
Application Method		Spray							
Test	Name/ID	Project Flash	(identical to F	roject Fl	ash Spra	ıy)			
Substance Preparation	Lots ☐ 1 ☐ 2 ☒ 3	PDI-0061-LO-938-112-A1 PDI-0061-LO-938-112-A2 PDI-0061-LO-938-112-A3							
	Preparation	Ready to Use at LCL							
Soil load		5% Fetal Bovine Serum							
Carrier type,	# per lot	Glass slides, 60							
Test condition	ons	Contact time	5 minutes	Temp	20°C	RH	36%		
Testing Lab,	Lab Study ID	Accuratus Lat	Services, A	19664					
Reviewer con (i.e. protocol of amendments, control failure etc.)	deviations and retesting,	None							

6.	MRID	50282514	Study Com	oletion D	ate:	11/21/	16	
Test organis ⊠ 1 □ 2 □ 3		Salmonella ent	terica (ATCC 1	0708)				
Test Method		AOAC Germici	dal Spray Metl	nod				
Application I	Method	Spray						
Test	Name/ID	Project Flash (identical to Pro	ject Flasl	n Spray))		
Substance Preparation	Lots ☐ 1 ⊠ 2 ☐ 3	PDI-0061-LO-938-148A PDI-0061-LO-938-148C						
	Preparation	Ready to Use a	at LCL					
Soil load		5% Fetal Bovin	ne Serum			10		
Carrier type,	# per lot	Glass slides, 60						
Test condition	ns	Contact time	1 minute	Temp	20°C	RH	47%	
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A20	969				
Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, neutralizer, etc.) None								

7.	MRID	50282515	Study Comple	etion Date:	1/14/16			
Test organis ☑ 1 ☐ 2 ☐ 3	지원 이 경기를 가는 것이 되었다. 그 그 전에 가는 것이 없는 것이 없는 것이다.	Multi-drug Res 19606)	sistant (MDR) Aci		umannii (ATCC			
Test Method		AOAC Germio	idal Spray Metho	od				
Application I	Method	Spray						
Test	Name/ID	Project Flash	(identical to Proje	ct Flash Spray	<i>'</i>)			
Substance Preparation	Lots □ 1 ⊠ 2 □ 3	PDI-0061-LO-938-112-A1 PDI-0061-LO-938-112-A2						
	Preparation	Ready to Use at LCL						
Soil load		5% Fetal Bovine Serum						
Carrier type,	# per lot	Glass slides,	10					
Test condition	ons	Contact time	5 minutes Te	emp 21.7°C	RH 15.2%			
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A1995	53				
Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, neutralizer, etc.) Antibiotic sensitivity testing conducted at University of Minnesota Physicians Outreach Laboratories. Strain demonstrated resistance to gentamicin and trimethopring the control failures are considered as university of Minnesota Physicians Outreach Laboratories.					Strain			

8.	MRID	50282516	Study Comp	letion D	ate:	12/6/1	6			
Test organis ⊠ 1 □ 2 □ 3		Multi-drug Resistant (MDR) Acinetobacter baumannii (ATCC 19606)								
Test Method		AOAC Germici	dal Spray Meth	od						
Application I	Method	Spray								
Test	Name/ID		dentical to Proj	ect Flasl	h Spray)				
Substance Preparation	Lots	PDI-0061-LO-938-148B								
	Preparation	Ready to Use at LCL								
Soil load		5% Fetal Bovine Serum								
Carrier type,	# per lot	Glass slides, 10								
Test condition	ns	Contact time	1 minute	Temp	20°C	RH	54%			
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A211	34						
Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, neutralizer, etc.) Antibiotic sensitivity testing conducted Minnesota Physicians Outreach Laborated resistance to gentamic demonstrated resistance and demonstrated resistance demonstrated resistance and demonstrated resistance demonstrated				h Labor	atories.	Strain	m/sulfa.			

9.	MRID	50282517	Study Com	pletion	Date:	9/15/	16		
Test organis		Carbapenem F				(ATCC	BAA-		
□ 1 □ 2 □ 3	□ 4+	1705)							
Test Method	推探其首张 图记录	AOAC Germic	idal Spray Met	thod					
Application I	Method	Spray							
Test	Name/ID	Project Flash (Project Flash (identical to Project Flash Spray)						
Substance	Lots	PDI-0061-LO-938-112-A1							
Preparation	□1⊠2□3	PDI-0061-LO-938-112-A2							
	Preparation	Ready to Use at LCL							
Soil load		5% Fetal Bovine Serum							
Carrier type,	# per lot	Glass slides, 10							
Test condition	ns	Contact time	5 minutes	Temp	20°C	RH	28%		
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A20	022					
Reviewer co	mments	Antibiotic sens	itivity testing o	onducte	d at Accui	ratus La	ab		
amendments,	deviations and retesting, s, neutralizer,	Services by modified Hodge test. Strain demonstrated carbapenemase activity in the presence of meropenem.							

10.	MRID	50282518	Study Comp	letion D	ate:	12/6/16	3		
Test organis ⊠ 1 □ 2 □ 3		Carbapenem Ro 1705)	esistant <i>Klebsi</i>	ella pnet	ımoniae	(ATCC	BAA-		
Test Method		AOAC Germicio	lal Spray Meth	od					
Application I	Method	Spray				7			
Test	Name/ID	Project Flash (id	dentical to Proj	ect Flash	Spray)				
Substance Preparation	Lots	PDI-0061-LO-938-148A							
	Preparation	Ready to Use at LCL							
Soil load		5% Fetal Bovine Serum							
Carrier type,	# per lot	Glass slides, 10							
Test condition	ns	Contact time	1 minute	Temp	21°C	RH	51%		
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A210	98					
Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, neutralizer, etc.) Antibiotic sensitivity testing conducted at Accuratus La Services by modified Hodge test. Strain demonstrated carbapenemase activity in the presence of meropener				nstrated					

11.	MRID	50282519	Study Com	pletion	Date:	9/15/1	16		
Test organis ☑ 1 ☐ 2 ☐ 3		Extended-Spec Escherichia co	ctrum beta-la	ctamase		roducin	g		
Test Method		AOAC Germici	dal Spray Me	thod					
Application I	Method	Spray							
Test	Name/ID		Project Flash (identical to Project Flash Spray)						
Substance Preparation	Lots □ 1 ⊠ 2 □ 3	PDI-0061-LO-938-112-A1 PDI-0061-LO-938-112-A2							
	Preparation	Ready to Use at LCL							
Soil load		5% Fetal Bovine Serum							
Carrier type,	# per lot	Glass slides, 10							
Test condition	ons	Contact time	5 minutes	Temp	20°C	RH	28%		
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A2	0020					
Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, neutralizer, etc.) Antibiotic Sensitivity testing conducted at Accuratus La Services by Etest® assay. Strain demonstrated ESBL according to the Etest package insert for ceftazidime/ceftazidime + clavulanic acid.									

12.	MRID	50282520	Study Comp	letion D	ate:	12/6/1	6		
Test organis ☑ 1 ☐ 2 ☐ 3		Extended-Spec Escherichia col	trum beta-lacta	mase (E					
Test Method		AOAC Germicio	dal Spray Meth	od					
Application I	Method	Spray							
Test	Name/ID	Project Flash (i	dentical to Proj	ect Flasi	n Spray))			
Substance Preparation	Lots ⊠ 1 □ 2 □ 3	PDI-0061-LO-9	PDI-0061-LO-938-148B						
	Preparation	Ready to Use at LCL							
Soil load		5% Fetal Bovin	e Serum						
Carrier type,	# per lot	Glass slides, 10)						
Test condition	ons	Contact time	1 minute	Temp	20°C	RH	51%		
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A211	56					
(i.e. protocol o	Antibiotic sensitivity testing conducted at Accuratus Lab Services by Etest® assay. Strain demonstrated ESBL activations, retesting, failures, neutralizer, failures, neutralizer,								

13.	MRID	50282521	Study Con	pletion	Date:	1/20/	16		
Test organis ☑ 1 ☐ 2 ☐ 3		Methicillin Resistant Staphylococcus aureus (MRSA) (ATCC 33592)							
Test Method		AOAC Germici	dal Spray Me	thod					
Application I	Method	Spray							
Test	Name/ID	Project Flash (identical to P	roject Fla	ash Spray)			
Substance Preparation	Lots □ 1 ⊠ 2 □ 3	PDI-0061-LO-938-112-A1 PDI-0061-LO-938-112-A2 Ready to Use at LCL							
	Preparation	Ready to Use at LCL							
Soil load	海切别和建筑市区域	5% Fetal Bovine Serum							
Carrier type,	# per lot	Glass slides, 10							
Test condition	ns	Contact time	5 minutes	Temp	22°C	RH	13.7%		
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A1	9948			*		
Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, neutralizer, etc.) Antibiotic sensitivity testing conducted at Accuratus Lab Services by Kirby Bauer assay. Strain demonstrated resistance to oxacillin.						ab			

14.	MRID	50282522	Study Comp	letion D	ate:	12/6/16	3		
Test organis ⊠ 1 □ 2 □ 3	보다를 받았는데 하셨다는데 하나 아이스라는 모드를 하게 하는데까?	Methicillin Resi 33592)	stant Staphyloo	coccus a	ureus (N	/IRSA) (A	TCC		
Test Method		AOAC Germicie	dal Spray Meth	od					
Application I	Method	Spray							
Test	Name/ID	Project Flash (i	dentical to Proj	ect Flasi	n Spray)				
Substance Preparation	Lots ⊠ 1 □ 2 □ 3	PDI-0061-LO-9	PDI-0061-LO-938-148A						
	Preparation	Ready to Use at LCL							
Soil load		5% Fetal Bovine Serum							
Carrier type,	# per lot	Glass slides, 10							
Test condition	ons	Contact time	1 minute	Temp	21°C	RH	49%		
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A211	35					
Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, neutralizer, etc.) Antibiotic sensitivity testing conducted at Accuratus Services by Kirby Bauer assay. Strain demonstrate resistance to oxacillin.).			

15.	MRID	50282523	Study Com	pletion	Date:	9/15/1	6		
Test organis ☑ 1 ☐ 2 ☐ 3		New Delhi met Enterobacter c				produci	ing		
Test Method		AOAC Germici	dal Spray Me	thod					
Application I	Method	Spray							
Test	Name/ID	Project Flash (i	identical to Pr	oject Fla	sh Spray)			
Substance	Lots	PDI-0061-LO-9	938-112-A1						
Preparation		PDI-0061-LO-9	PDI-0061-LO-938-112-A2						
	Preparation	Ready to Use at LCL							
Soil load		5% Fetal Bovine Serum							
Carrier type,	# per lot	Glass slides, 10							
Test condition	ons	Contact time	5 minutes	Temp	20°C	RH	28%		
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A2	0021		Lacore de la constante de la c	1		
Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, neutralizer, etc.) Antibiotic sensitivity testing conducted at University of Minnesota Physicians Outreach Laboratories. Strain demonstrated resistance to ertapenem, imipenem, amika ampicillin, ampicillin/sulbactam, cefazolin, cefepime, ceftazidime, ceftriaxone, ciprofloxacin, gentamicin, levofloxacin, piperacillin/tazo, tobramycin, trimethoprim/s and meropenem.					nikacin,				

16.	MRID	50282524	Study Comp	letion D	ate:	12/6/1	6		
Test organis ☑ 1 ☐ 2 ☐ 3		New Delhi meta Enterobacter ca	allo-beta-lactan	nase 1 (I	NDM-1)	producin	ig		
Test Method		AOAC Germicio	dal Spray Meth	od					
Application I	Method	Spray							
Test	Name/ID	Project Flash (i	dentical to Proj	ect Flasi	Spray)			
Substance Preparation	Lots	PDI-0061-LO-9	PDI-0061-LO-938-148B						
	Preparation	Ready to Use at LCL							
Soil load	STEPHEN STATES	5% Fetal Bovine Serum							
Carrier type,	# per lot	Glass slides, 10							
Test condition	ns	Contact time	1 minute	Temp	20°C	RH	49%		
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A211	55					
Reviewer col (i.e. protocol of amendments, control failure etc.)	deviations and retesting,	Antibiotic sensitivity testing conducted at University of Minnesota Physicians Outreach Laboratories. Strain demonstrated resistance to ertapenem, imipenem, amikacin					kacin,		

17.	MRID	50282525	Study Com	pletion [Date:	1/20/	16	
Test organis ☑ 1 ☐ 2 ☐ 3	[2] [2] [2] [2] [2] [2] [2] [2] [2] [2]	Vancomycin re 51575)	esistant <i>Enterd</i>	ococcus f	aecalis (\	/RE) (/	ATCC	
Test Method		AOAC Germio	idal Spray Met	thod				
Application I	Method	Spray						
Test	Name/ID	Project Flash	identical to Pr	oject Flas	sh Spray))		
Substance Preparation	Preparation							
Preparation Ready to Use at LCL								
Soil load		5% Fetal Bovi	ne Serum					
Carrier type,	# per lot	Glass slides, 1	0					
Test condition	ns	Contact time	5 minutes	Temp	20.4°C	RH	18.2%	
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A19	946				
Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, neutralizer, etc.) Accuratus Lab Services, A19946 Antibiotic sensitivity testing conducted at Accuratus Lab Services by Kirby Bauer assay. Strain demonstrated resistance to vancomycin. The test culture was allowed to stand for 1 minute (as opposed to 10 minutes) between vortex mixing and remo and pooling of the upper portion of the culture for use in t test.						s emoval		

18.	MRID	50282526	Study Comp	letion D	ate:	12/6/10	6	
Test organis ⊠ 1 □ 2 □ 3		Vancomycin re 51575)	esistant <i>Enteroc</i>	occus fa	ecalis (\	/RE) (AT	CC	
Test Method		AOAC Germic	idal Spray Meth	od				
Application I	Method	Spray						
Test	Name/ID	Project Flash (identical to Proj	ect Flasi	n Spray)	1		
Substance Preparation	Lots ⊠ 1 □ 2 □ 3	THE PERSON NAMED IN COLUMN TO SERVICE AND ADDRESS OF THE PERSON NAMED IN COLUMN TO SE						
	Preparation	tion Ready to Use at LCL						
Soil load		5% Fetal Bovine Serum						
Carrier type,	# per lot	Glass slides, 10						
Test condition	ons	Contact time	1 minute	Temp	21°C	RH	51%	
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A211	37				
Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, neutralizer, etc.) Antibiotic sensitivity testing conducted at Accuratus Lab Services by Kirby Bauer assay. Strain demonstrated resistance to vancomycin.						b		

19.	MRID	50282527	Study Com	pletion Date:	9/15/1	16			
Test organis ⊠ 1 □ 2 □ 3		Adenovirus Ty	pe 5, Strain A	denoid 75 (ATCC	VR-5)				
Test Method		ASTM E1053							
Application I	Method	Spray							
Test	Name/ID	Project Flash (identical to Pr	roject Flash Spray)				
Substance Preparation	Lots □ 1 □ 2 ⊠ 3	PDI-0061-LO-9	PDI-0061-LO-938-112-A1 PDI-0061-LO-938-112-A2 PDI-0061-LO-938-112-A3						
	Preparation	Ready to Use a	at LCL						
Soil load		5% Fetal Bovine Serum							
Carrier type,	# per lot	Glass petri disl	nes, 5						
Test condition	ns	Contact time	5 minutes	Temp 21.0°C	RH	NR			
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A2	0043					
(i.e. protocol of amendments, control failure etc.)	deviations and retesting,	None							

20.	MRID	50282528	Study Comp	letion D	ate:	11/21/	16			
Test organis ☑ 1 ☐ 2 ☐ 3		Adenovirus Typ								
Test Method		ASTM E1053								
Application !	Method	Spray								
Test	Name/ID	Project Flash (i	dentical to Pro	ject Flas	h Spray))				
Substance Preparation	Lots □ 1 ⊠ 2 □ 3	마이 시어지에 가입되었다면서 하는 가입다. 나당	PDI-0061-LO-938-148B PDI-0061-LO-938-148C							
	Preparation	Ready to Use a	Ready to Use at LCL							
Soil load		5% Fetal Bovine Serum								
Carrier type,	# per lot	Glass petri dish	nes, 1							
Test condition	ns	Contact time	1 minute	Temp	21.0°C	RH	NR			
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A21	164						
Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, neutralizer, etc.)										

21.	MRID	50282529	Study Com	pletion	Date:	10/10	/16		
Test organis ⊠ 1 □ 2 □ 3	CONTROL ACCUMENTS OF THE PROPERTY OF THE PROPE	Rhinovirus Type 1A, Strain 2060 (ATCC VR-1559)							
Test Method		ASTM E1053							
Application I	Method	Spray							
Test	Name/ID	Project Flash (identical to Pi	oject Fla	sh Spray)			
Substance Preparation	Lots □ 1 ⊠ 2 □ 3	NA CONTRACTOR OF THE CONTRACTO							
	Preparation	Ready to Use at LCL							
Soil load		5% Fetal Bovine Serum							
Carrier type,	# per lot	Glass petri dishes, 1							
Test condition	ns	Contact time	5 minutes	Temp	21.0°C	RH	NR		
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A2	0024					
Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, neutralizer, etc.)									

22.	MRID	50282530	Study Com	pletion Date:	11/21/16					
Test organis ⊠ 1 □ 2 □ 3		Rhinovirus Typ	e 1A, Strain 2	2060 (ATCC VR	-1559)					
Test Method		ASTM E1053								
Application I	Vethod	Spray								
Test	Name/ID	Project Flash (identical to Pi	roject Flash Spra	ay)					
Substance Preparation	Lots	PDI-0061-LO-9	PDI-0061-LO-938-148A							
	Preparation	Ready to Use a	Ready to Use at LCL							
Soil load		5% Fetal Bovine Serum								
Carrier type,	# per lot	Glass petri dishes, 1								
Test condition	ons	Contact time	1 minute	Temp 20.0°C	RH NR					
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A2	1133						
Reviewer con (i.e. protocol of amendments, control failure etc.)	deviations and retesting,	None								

23.	MRID	50282531	Study Con	pletion	Date:	10/10/	′16			
Test organis ⊠ 1 □ 2 □ 3		Rotavirus, Stra								
Test Method		ASTM E1053								
Application I	Method	Spray								
Test	Name/ID	Project Flash (identical to P	roject Fla	sh Spray))				
Substance Preparation	Lots □ 1 ⊠ 2 □ 3	PDI-0061-LO-9	PDI-0061-LO-938-112-A1 PDI-0061-LO-938-112-A2							
	Preparation	Ready to Use at LCL								
Soil load		5% Fetal Bovine Serum								
Carrier type,	# per lot	Glass petri dishes, 1								
Test condition	ons	Contact time	5 minutes	Temp	20.0°C	RH	NR			
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A2	0023			been commenced to			
amendments,	deviations and	None								

24.	MRID	50282532	Study Con	npletion	Date:	11/21	/16	
Test organis ⊠ 1 □ 2 □ 3		Rotavirus, Strain WA (ATCC VR-2018)						
Test Method	Test Method							
Application I	Application Method							
Test	Name/ID	Project Flash (identical to P	roject Fla	sh Spray)		
Substance Preparation								
	Preparation	Ready to Use at LCL						
Soil load		5% Fetal Bovine Serum						
Carrier type,	# per lot	Glass petri dis	hes, 1					
Test condition	ns	Contact time	1 minute	Temp	21.0°C	RH	NR	
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A2	1186			2000000	
amendments,	deviations and	An initial test performed on July 6, 2016 did not produce valid data due to the disruption of the indicator cell monolayer. The test was successfully repeated on July 26, 2016.						

NR = Not reported

25.	MRID	50282533	Study Con	pletion	Date:	10/10	/16		
	Test organism(s) ⊠ 1 □ 2 □ 3 □ 4+		Herpes Simplex Virus Type 2, Strain G (ATCC VR-734)						
Test Method	Test Method								
Application I	Method	Spray							
Test	Name/ID	Project Flash (i	identical to P	roject Fla	ash Spray)			
Substance Preparation	Lots ☐ 1 ⊠ 2 ☐ 3 Preparation	1 1 ⊠ 2 □ 3 PDI-0061-LO-938-112-A2							
Soil load		5% Fetal Bovine Serum							
Carrier type,	# per lot	Glass petri dishes, 1							
Test condition		Contact time		Temp	20.0°C	RH	NR		
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A1	9992					
Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, neutralizer, etc.)		None							

NR = Not reported

26.	MRID	50282534	Study Con	pletion	Date:	11/21	/16		
	Test organism(s) ⊠ 1 □ 2 □ 3 □ 4+		Herpes Simplex Virus Type 2, Strain G (ATCC VR-734)						
Test Method		ASTM E1053							
Application Method		Spray							
Test	Name/ID	Project Flash (i	dentical to P	roject Fla	ash Spray)			
Substance Preparation	Lots ⊠ 1 □ 2 □ 3	PDI-0061-LO-938-148B							
	Preparation	Ready to Use at LCL							
Soil load		5% Fetal Bovine Serum							
Carrier type,	# per lot	Glass petri dishes, 1							
Test condition	ns	Contact time	1 minute	Temp	21.0°C	RH	NR		
Testing Lab,	Lab Study ID	Accuratus Lab Services, A21140							
amendments,	deviations and	None							

NR = Not reported

27.	MRID	50282535	Study Con	pletion I	Date:	9/15/	16	
Test organism(s) ⊠ 1 □ 2 □ 3 □ 4+		Influenza A Virus (H3N2), Strain A/HongKong/8/68 (ATCC VR-544)						
Test Method		ASTM E1053						
Application I	Method	Spray						
Test	Name/ID	Project Flash (identical to P	roject Fla	sh Spray	′)		
Substance Preparation	Lots □ 1 ⊠ 2 □ 3	PDI-0061-LO-938-112-A1 PDI-0061-LO-938-112-A2						
	Preparation	Ready to Use at LCL						
Soil load		5% Fetal Bovine Serum						
Carrier type,	# per lot	Glass petri dis	hes, 1					
Test condition	ns	Contact time	5 minutes	Temp	20.0°C	RH	NR	
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A2	0058				
Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, neutralizer, etc.)		None						

NR = Not reported

28.	MRID	50282536	Study Cor	npletion	Date:	11/21	/16		
PERSONAL PROPERTY OF THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TO THE PER	Test organism(s) ⊠ 1 □ 2 □ 3 □ 4+		Influenza A Virus (H3N2), Strain A/HongKong/8/68 (ATCC VR-544)						
Test Method		ASTM E1053							
Application Method		Spray							
Test	Name/ID		Project Flash (identical to Project Flash Spray)						
Substance Preparation	Lots ⊠ 1 □ 2 □ 3	PDI-0061-LO-938-148A							
	Preparation	Ready to Use at LCL							
Soil load		5% Fetal Bovine Serum							
Carrier type,	# per lot	Glass petri disl	nes, 1						
Test condition	ns	Contact time	1 minute	Temp	21.0°C	RH	NR		
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A2	1136	36-100-00 500	Alexander and a second			
amendments,	deviations and	None	·						

NR = Not reported

29.	MRID	50282537	Study Completion Date:	9/15/16			
Test organism(s) ☑ 1 □ 2 □ 3 □ 4+		Respiratory Syncytial Virus, Strain Long (ATCC VR-26)					
Test Method		ASTM E1053					
Application I	Method	Spray					
Test	Name/ID	Project Flash (identical to Project Flash Spra	ıy)			
Substance Preparation	Lots □ 1 ⊠ 2 □ 3	PDI-0061-LO-938-112-A1 PDI-0061-LO-938-112-A2					
	Preparation	Ready to Use at LCL					
Soil load		5% Fetal Bovine Serum					
Carrier type,	# per lot	Glass petri disl	hes, 1				
Test condition	ns	Contact time	5 minutes Temp 20.0°C	RH NR			
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A20059				
Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, neutralizer, etc.)		None					

NR = Not reported

30.	MRID	50282538	Study Con	npletion Date:	11/21/16			
Test organism(s) ☑ 1 □ 2 □ 3 □ 4+		Respiratory Syncytial Virus, Strain Long (ATCC VR-26)						
Test Method		ASTM E1053						
Application I	Method	Spray						
Test	Name/ID	Project Flash	(identical to P	roject Flash Spray)			
Substance Preparation	Lots ⊠ 1 □ 2 □ 3	PDI-0061-LO-938-148B						
	Preparation	Ready to Use	at LCL					
Soil load		5% Fetal Bovine Serum						
Carrier type,	# per lot	Glass petri dis	hes, 1					
Test condition	ns	Contact time	1 minute	Temp 21.0°C	RH NR			
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A2	1145				
amendments,	deviations and	None			5			

NR = Not reported

31.	MRID	50282539	Study Con	pletion	Date:	9/15/	16		
Test organism(s) ☑ 1 □ 2 □ 3 □ 4+		Feline Calicivirus, Strain F-9 (ATCC VR-782)							
Test Method		ASTM E1053							
Application Method		Spray							
Test	Name/ID	Project Flash (identical to P	roject Fla	sh Spray	')			
Substance Preparation	Lots □ 1 ⊠ 2 □ 3	PDI-0061-LO-938-112-A1 PDI-0061-LO-938-112-A2							
	Preparation	Ready to Use at LCL							
Soil load		5% Fetal Bovine Serum							
Carrier type,	# per lot	Glass petri dishes, 2							
Test condition	ons	Contact time	5 minutes	Temp	20.0°C	RH	NR		
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A2	0046		CHIEF STREET			
amendments,	deviations and	None							

NR = Not reported

32.	MRID	50282540	Study Cor	npletion	Date:	11/21	/16	
Test organism(s) 図 1 □ 2 □ 3 □ 4+		Feline Calicivirus, Strain F-9 (ATCC VR-782)						
Test Method	Test Method							
Application Method		Spray						
Test	Name/ID	Project Flash (Project Flash (identical to Project Flash Spray)					
Substance Preparation	Lots	PDI-0061-LO-938-148A						
	Preparation	Ready to Use at LCL						
Soil load		5% Fetal Bovine Serum						
Carrier type,	# per lot	Glass petri dishes, 2						
Test condition	ns	Contact time	1 minute	Temp	21.0°C	RH	NR	
Testing Lab,	Lab Study ID	Accuratus Lab Services, A20967						
Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, neutralizer, etc.)		None						

NR = Not reported

33.	MRID	50282541	Study Con	pletion	Date:	4/25/	16
Test organis	m(s)	Duck Hepatitis	B Virus, Stra	in 11/4/1	2 (Hepad	navirus	Testing,
⊠1□2□3	□ 4+	Inc.)					
Test Method		ASTM E1053					
Application Method		Spray		204			
Test	Name/ID	Project Flash (i	dentical to P	roject Fla	ash Spray)	
Substance Lots PDI-0061-LO-938-112-A1							
Preparation		PDI-0061-LO-938-112-A2					
	Preparation	n Ready to Use at LCL					
Soil load		100% Duck Serum					
Carrier type,	# per lot	Glass petri dishes, 2					
Test condition	ns	Contact time	5 minutes	Temp	21.0°C	RH	NR
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A1	9765			
amendments,	deviations and	None					

NR = Not reported

34.	MRID	50282542	Study Con	pletion	Date:	11/21/	16	
Test organism(s) ⊠ 1 □ 2 □ 3 □ 4+		Duck Hepatitis B Virus, Strain 11/4/12 (Hepadnavirus Testing, Inc.)						
Test Method		ASTM E1053						
Application I	Vethod	Spray						
Test	Name/ID	Project Flash (identical to P	roject Fla	sh Spray)		
Substance Preparation	Lots	PDI-0061-LO-938-148A						
rieparation	⊠1□2□3			T-030- T-030				
	Preparation	Ready to Use	at LCL					
Soil load		100% Duck Serum						
Carrier type,	# per lot	Glass petri disl	nes, 2		1.000.772			
Test condition	ns	Contact time	1 minute	Temp	20.0°C	RH	NR	
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A2	0937				
amendments,	deviations and	None						

NR = Not reported

35.	MRID	50282543 Study Completion Date: 9/15/16					
Test organis		Bovine Viral Diarrhea Virus, Strain Oregon C24v-genotype 1					
⊠1□2□3	3 □ 4+	(National Veterinary Services Laboratories)					
Test Method		ASTM E1053					
Application I	Method	Spray					
Test	Name/ID	Project Flash (identical to Project Flash Spray)					
Substance	Lots	PDI-0061-LO-938-112-A1					
Preparation	□1⊠2□3	PDI-0061-LO-938-112-A2					
	Preparation	Ready to Use at LCL					
Soil load		5% Horse Serum					
Carrier type,	# per lot	Glass petri dishes, 2					
Test condition	ons	Contact time 5 minutes Temp 20.0°C RH NR					
Testing Lab,	Lab Study ID	Accuratus Lab Services, A20045					
amendments,	deviations and	Indicator cell: Bovine Turbinate cells (ATCC CRL-1390) Test medium: MEM +5% non-heat inactivated Horse Serum supplemented with 10µg/mL gentamicin, 100 units/mL penicillin, 2.5µg/mL amphotericin B Neutralizer: Sephadex LH-20 gel columns Presence of the virus was verified by direct immunofluorescence assay on the final day of incubation.					

NR = Not reported

36.	MRID	50282544	Study Cor	npletion	Date:	1/9/1	7	
Test organis ☑ 1 ☐ 2 ☐ 3		Bovine Viral Di BioResearch L		, Strain N	NADL (Ar	nerican		
Test Method		ASTM E1053						
Application I	Method	Spray						
Test	Name/ID	Project Flash (identical to F	roject Fla	ash Spra	y)		
Substance Preparation	Lots ⊠ 1 □ 2 □ 3	PDI-0061-LO-1	1003-014A					
	Preparation	Ready to Use at LCL						
Soil load		5% serum						
Carrier type,	# per lot	Glass petri dishes, 2						
Test condition	ons	Contact time	1 minute	Temp	20°C	RH	20.7-21.6%	
Testing Lab,	Lab Study ID	Microbac, Micr	oBioTest Div	ision,735	-217			
Testing Lab, Lab Study ID Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, neutralizer, etc.) Microbac, MicroBioTest Division,735-217 Indicator cell: MDBK cells (ATCC CCL-22) Dilution medium: MEM + 2% Horse Serum Neutralizer: MEM + 10% Horse Serum + 0.5% polysorb + 0.1% Catalase + 0.5% Na ₂ S ₂ O ₃ + 5% HEPES + 1% NaHCO ₃ . Report indicates Sephacryl columns may have used, but the procedure was not clearly described.					%			

37.	MRID	50282545	Study Com	pletion	Date:	10/10	/16		
Test organis ⊠ 1 □ 2 □ 3		Human Immunodeficiency Virus Type 1, Strain HTLV-III _B (Advanced Biotechnologies, Inc.)							
Test Method		ASTM E1053							
Application I	Method	Spray							
Test	Name/ID	Project Flash (identical to P	roject Fla	ash Spray)			
Substance Preparation	Lots	PDI-0061-LO-9	938-112-A2						
	Preparation	Ready to Use at LCL							
Soil load		5% Fetal Bovine Serum							
Carrier type,	# per lot	Glass petri disl	nes, 1						
Test condition	ons	Contact time	5 minutes	Temp	21.0°C	RH	NR		
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A1	9993	•				
amendments,	deviations and	None							

38.	MRID	50282546	Study Con	npletion Date:	11/21/16			
Test organis ☑ 1 ☐ 2 ☐ 3		Human Immun (Advanced Bio		Virus Type 1, Strai , Inc.)	n HTLV-III _B			
Test Method		ASTM E1053						
Application I	Method	Spray						
Test	Name/ID	Project Flash (identical to P	roject Flash Spray	/)			
Substance Preparation	Lots ⊠ 1 □ 2 □ 3	PDI-0061-LO-938-148B						
	Preparation	Ready to Use at LCL						
Soil load		5% Fetal Bovir	ne Serum					
Carrier type,	# per lot	Glass petri dis	hes, 1					
Test condition	ns	Contact time	1 minute	Temp 21.0°C	RH NR			
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A2	1195				
Reviewer con (i.e. protocol of amendments, control failure etc.)	deviations and retesting,	None						

39.	MRID	50282547	Study Con	npletion	Date:	10/12	2/16	
Test organis ☑ 1 ☐ 2 ☐ 3		Mycobacteriun		The second secon)		
Test Method		AOAC Germicidal Spray Method with appropriate elements of the AOAC Tuberculocidal Activity of Disinfectants Test						
Application I	Vethod	Spray						
Test	Name/ID	Project Flash (identical to P	roject Fla	ash Spray	')		
Substance Preparation	Lots □ 1 ⊠ 2 □ 3	PDI-0061-LO-938-112-A1 PDI-0061-LO-938-112-A2						
	Preparation	Ready to Use	at LCL					
Soil load		5% Fetal Bovine Serum						
Carrier type,	# per lot	Glass slides, 1	0					
Test condition	ons	Contact time	5 minutes	Temp	22.4°C	RH	46.8%	
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A1	9658	Xviii in a constant			
amendments,	deviations and	None						

40.	MRID	50282548	Study Co	mpletion Date:	12/15/16				
Test organis ⊠ 1 □ 2 □ 3		Mycobacterium bovis BCG (Organon Teknika)							
Test Method				lethod with approp Activity of Disinfed	oriate elements of stants Test				
Application I	Viethod	Spray							
Test	Name/ID	Project Flash	(identical to F	Project Flash Spra	ıy)				
Substance Preparation	Lots □ 1 ⊠ 2 □ 3	PDI-0061-LO-938-148A PDI-0061-LO-938-148B							
	Preparation	Ready to Use	at LCL						
Soil load		5% Fetal Bovine Serum							
Carrier type,	# per lot	Glass slides, 1	0						
Test condition	ns	Contact time	1 minute	Temp 21°C	RH 47%				
Testing Lab,	Lab Study ID	Microbac, Mic	roBioTest Div	vision, 735-203					
Reviewer con (i.e. protocol of amendments, control failure etc.)	deviations and retesting,	Test tubes used for secondary transfers (MPB, 7H9, KM) and control tubes were incubated ±1°C outside the indicated temperature range (36±1°C) at two points during the incubation period.							

41.	MRID	50282549	Study Com	pletion	Date:	9/15/1	6		
Test organis ⊠ 1 □ 2 □ 3		Trichophyton mentagrophytes (ATCC 9533)							
Test Method		AOAC Germici	idal Spray Me	thod					
Application I	Method	Spray							
Test	Name/ID	Project Flash (identical to Pr	oject Fla	sh Spray				
Substance Preparation	Lots ☐ 1 ⊠ 2 ☐ 3 Preparation	PDI-0061-LO-938-112-A1 PDI-0061-LO-938-112-A2 Ready to Use at LCL							
Soil load		5% Fetal Bovine Serum							
Carrier type,	# per lot	Glass slides, 10							
Test condition	ns	Contact time	5 minutes	Temp	21.6°C	RH	10.4%		
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A2	0044					
amendments,	deviations and	Neutralizer: Sabouraud Dextrose Broth + 0.14% Lecithin + 1.0% Tween 80 (Primary and Secondary) Two lots of neutralizing subculture medium were used in testing, however only one lot of uninoculated medium was incubated for the neutralizing subculture medium sterility control.							

42.	MRID	50282550	Study Comp	letion D	ate:	12/6/10	3		
Test organis ⊠ 1 □ 2 □ 3		Trichophyton mentagrophytes (ATCC 9533)							
Test Method		AOAC Germicidal Spray Method							
Application I	Method	Spray							
Test	Name/ID	Project Flash (identical to Pro	ect Flas	h Spray)				
Substance Preparation	Lots ⊠ 1 □ 2 □ 3	PDI-0061-LO-938-148A							
	Preparation	n Ready to Use at LCL							
Soil load		5% Fetal Bovine Serum							
Carrier type,	# per lot	Glass slides, 10							
Test condition	ns	Contact time	1 minute	Temp	20.1°C	RH	62%		
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A210	64					
(i.e. protocol of amendments, control failure etc.)	deviations and retesting,	Neutralizer: Sabouraud Dextrose Broth + 0.07% Lecithin + 0.5% Tween 80 + 0.01% Catalase (Primary and Secondary)							

43.	MRID	50282551	Study Con	npletion	Date:	1/22/1	16		
Test organis		Candida albicans (ATCC 10231)							
⊠1□2□3									
Test Method		AOAC Germic	idal Spray Me	ethod					
Application I	Method	Spray							
Test	Name/ID	Project Flash (identical to P	roject Fla	ash Spray)			
Substance Preparation	Lots □ 1 ⊠ 2 □ 3	PDI-0061-LO-938-112-A1 PDI-0061-LO-938-112-A2							
	Preparation	Ready to Use	at LCL						
Soil load		5% Fetal Bovine Serum							
Carrier type,	# per lot	Glass slides, 10							
Test condition	ons	Contact time	5 minutes	Temp	18.9°C	RH	13.1%		
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A1	9952		20			
amendments,	deviations and	None							

44.	MRID	50282552	Study Com	oletion D	ate:	12/6/16	3	
Test organis ☑ 1 ☐ 2 ☐ 3		Candida albica	ans (ATCC 102	31)				
Test Method		AOAC Germic	idal Spray Met	hod				
Application I	Method	Spray		2011-0-2011-0-201				
Test	Name/ID	Project Flash	identical to Pro	ject Flasl	n Spray)		
Substance Preparation PDI-0061-LO-938-148B □ 1 □ 2 □ 3								
	Preparation	Ready to Use at LCL						
Soil load		5% Fetal Bovine Serum						
Carrier type,	# per lot	Glass slides, 10						
Test condition	ns	Contact time	1 minute	Temp	20°C	RH	50%	
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A21	138	B 100 100 100			
Reviewer con (i.e. protocol of amendments, control failure etc.)	deviations and retesting,	The test culture was incubated for 45 hours 45 minutes instead of the 48-54 hours specified in the protocol.						

45.	MRID	50282553	Study Comp	letion Da	ate:	12/23/	15		
Test organis 図 1 □ 2 □ 3		Clostridium difficile – spore form (ATCC 43598)							
Test Method		ASTM E2197							
Application I	Viethod	Liquid							
Test	Name/ID	Project Flash	(identical to Proj	ect Flash	Spray)				
Substance Preparation	Lots	PDI-0061-MF	RC-938-100A						
	Preparation	Ready to Use	at LCL						
Soil load		0.25% Bovine Serum Albumin, 0.08% Bovine Mucin, and 0.35% Yeast Extract							
Carrier type,	# per lot	Brushed stair	less steel disks,	10 test +	3 contr	ol			
Test condition		Contact time		Temp	21°C	RH	33%		
Testing Lab,	Lab Study ID	Accuratus La	b Services, A194	59					
Reviewer con (i.e. protocol of amendments, control failure etc.)	deviations and retesting,	None							

46.	MRID	50282554	Study Comp	letion Da	ate:	3/28/16			
Test organis ⊠ 1 □ 2 □ 3		Clostridium di	fficile – spore fo	m (ATC	43598	3)			
Test Method		ASTM E2197							
Application I	Method	Liquid							
Test	Name/ID	Project Flash	(identical to Proj	ect Flash	Spray))			
Substance Preparation	Lots ⊠ 1 □ 2 □ 3	PDI-0061-LO-	PDI-0061-LO-938-120-B						
	Preparation	Ready to Use at LCL							
Soil load		0.25% Bovine Serum Albumin, 0.08% Bovine Mucin, and 0.35% Yeast Extract							
Carrier type,	# per lot	Brushed stain	less steel disks,	10 test +	3 conti	rol			
Test condition	ns	Contact time	5 minutes	Temp	20°C	RH 14%			
Testing Lab,	Lab Study ID	Accuratus Lab	Services, A201	01					
Reviewer col (i.e. protocol of amendments, control failure etc.)	deviations and retesting,	None							

47.	MRID	50282555	Study Comp	letion Da	ate:	10/19	/16		
Test organis ☑ 1 ☐ 2 ☐ 3	아이아 아이아 내는 그 그 그리는 내가 살아 다니다.	Clostridium difficile – spore form (ATCC 43598)							
Test Method		ASTM E2197							
Application I	Method	Liquid							
Test	Name/ID	Project Flash	(identical to Proj	ect Flash	Spray)				
Substance Preparation	Lots ⊠ 1 □ 2 □ 3	PDI-0061-LO-938-128A							
	Preparation	Ready to Use	at LCL						
Soil load		0.25% Bovine Serum Albumin, 0.08% Bovine Mucin, and 0.35% Yeast Extract							
Carrier type,	# per lot	Brushed stain	less steel disks,	10 test +	- 3 contr	rol			
Test condition	ons	Contact time		Temp	21°C	RH	22%		
Testing Lab,	Lab Study ID	Accuratus Lat	Services, A202	77		***			
amendments,	deviations and	None							

IV STUDY RESULTS

Disinfection - Bactericidal Efficacy

MRID	Organism		g Growth/Tota		Average
		PDI-0061- LO-938-112- A1	PDI-0061- LO-938-112- A2	PDI-0061- LO-938-112- A3	log ₁₀ CFU/Carrier
	5 minu	ute contact time	RTU, 5% soil	load	
50282510	Staphylococcus aureus (ATCC 6538)	0/60	0/60	0/60	5.61
50282511	Pseudomonas aeruginosa (ATCC 15442)	0/60	0/60	0/60	5.63
50282513	Salmonella enterica (ATCC 10708)	0/60	0/60	0/60	4.38
50282515	Multi-drug Resistant (MDR) Acinetobacter baumannii (ATCC 19606)	0/10	0/10		5.69
50282517	Carbapenem Resistant Klebsiella pneumoniae (ATCC BAA- 1705)	0/10	0/10		4.97
50282519	Extended- Spectrum beta- lactamase (ESBL) producing Escherichia coli (ATCC BAA- 196)	0/10	0/10		6.12
50282521	Methicillin Resistant Staphylococcus aureus (MRSA) (ATCC 33592)	0/10	0/10		4.86
50282523	New Delhi metallo-beta- lactamase 1 (NDM-1) producing Enterobacter cloacae (CDC 1000654)	0/10	0/10		6.24

MRID	Organism	No. Exhibitin	No. Exhibiting Growth/Total No. Tested					
		PDI-0061- LO-938-112- A1	PDI-0061- LO-938-112- A2	PDI-0061- LO-938-112- A3	log₁₀ CFU/Carrier			
	5 min	ute contact time	, RTU, 5% soil	load				
50282525	Vancomycin resistant Enterococcus faecalis (VRE) (ATCC 51575)	0/10	0/10		4.83			

MRID	Organism	No. Exhibiting		Average	
	45.50	PDI-0061-LO- 938-148A	938-148B	PDI-0061-LO- 938-148C	log ₁₀ CFU/Carrier
	1 m	inute contact tim	e, RTU, 5% soil	load	
50282509	Staphylococcus aureus (ATCC 6538)	0/60		0/60	5.57
50282512	Pseudomonas aeruginosa (ATCC 15442)	0/60		0/60	5.72
50282514	Salmonella enterica (ATCC 10708)	0/60		0/60	5.34
50282516	Multi-drug Resistant (MDR) Acinetobacter baumannii (ATCC 19606)		0/10		5.49
50282518	Carbapenem Resistant Klebsiella pneumoniae (ATCC BAA- 1705)	0/10			5.19
50282520	Extended- Spectrum beta- lactamase (ESBL) producing Escherichia coli (ATCC BAA- 196)		0/10		4.87
50282522	Methicillin Resistant Staphylococcus aureus (MRSA) (ATCC 33592)	0/10			4.84

MRID	Organism	No. Exhibiting	No. Exhibiting Growth/Total No. Tested						
		PDI-0061-LO- 938-148A	PDI-0061-LO- 938-148B	PDI-0061-LO- 938-148C	log ₁₀ CFU/Carrier				
	1 m	inute contact tim	e, RTU, 5% soil	load					
50282524	New Delhi metallo-beta- lactamase 1 (NDM-1) producing Enterobacter cloacae (CDC 1000654)		0/10		6.26				
50282526	Vancomycin resistant Enterococcus faecalis (VRE) (ATCC 51575)	0/10			5.02				

Disinfection – Virucidal Efficacy

Organism	Adenovirus Typ	ype 5, Strain Adenoid 75 (ATCC VR-5)														
MRID	Description	Res	5 minutes, RTU, 5% soil load							Dried Virus Control (Log ₁₀ TCID ₅₀ /carrier						
					s, F					oac	ď			r is		
50282527	Lot	PDI- LO-9 A1			2-				1- 112	!-	L	PDI-0061- LO-938-112- A3				6.98*
	Replicate	1 2	1	4	5	1	2	3	4	5	1	2	3	4	5	
	10 ⁻¹ dilution	TT	4	0	0	T	Т	Т	T	0	T	0	0	0	0	
	10 ⁻² to 10 ⁻⁸	0 0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	dilution															
	Maximum Log₁₀ TCID₅₀/carrier	≤1.5	0			≤1	1.50	1			≤1	.50)			
	Minimum Log Reduction	≥5.48			≥5.48			≥5	≥5.48							
				nute		TU,	5%	6 S	oil Id	oad				75		
50282528	Lot	PDI- 938-			0-	920	DI-		61-l BC	_0-	•					8.00
	10 ⁻¹ dilution	T				T	•									
	10 ⁻² to 10 ⁻⁸ dilution	0				0)									
	Log ₁₀ TCID ₅₀ /carrier	≤2.5)**			≤	1.5	0								
	Log Reduction	≥5.5	כ	0.000		2	:6.5	0								

T = Cytotoxicity; 0 = Complete inactivation

*Average of 5 replicates
**Cytotoxicity was observed at the 10⁻² dilution in the cytotoxicity and neutralization confirmation controls, but not in the test.

MRID	Organism	Description	Results		Dried Virus Control (Log₁₀ TCID₅₀/carrier)	
			PDI-0061- LO-938- 112-A1	PDI-0061- LO-938- 112-A2		
		5 minutes, RT	U, 5% soil load	d		
50282529	Rhinovirus Type 1A, Strain 2060	10 ⁻¹ dilution	Complete inactivation	Cytotoxicity	5.00	
	(ATCC VR-1559)	10 ⁻² to 10 ⁻⁸ dilution	Complete inactivation	Complete inactivation		
		Log ₁₀ TCID ₅₀ /carrier	≤1.50*	≤1.50		
		Log Reduction	≥3.50	≥3.50		
50282531	Rotavirus, Strain WA (ATCC VR-	10 ⁻¹ to 10 ⁻⁸ dilution	Complete inactivation	Complete inactivation	5.50	
	2018)	Log ₁₀ TCID ₅₀ /carrier	≤0.50	≤0.50		
	,	Log Reduction	≥5.00	≥5.00		
50282533	Herpes Simplex Virus Type 2,	10 ⁻¹ to 10 ⁻⁷ dilution	Complete inactivation	Complete inactivation	4.50	
	Strain G (ATCC VR-734)	Log ₁₀ TCID ₅₀ /carrier	≤0.50	≤0.50		
	,	Log Reduction	≥4.00	≥4.00		
50282535	Influenza A Virus (H3N2), Strain	10 ⁻¹ to 10 ⁻⁸ dilution	Complete inactivation	Complete inactivation	5.00	
*	A/HongKong/8/68 (ATCC VR-544)	Log ₁₀ TCID ₅₀ /carrier	≤1.50*	≤1.50*		
	A application of well-stated above the Co	Log Reduction	≥3.50	≥3.50		
50282537	Respiratory Syncytial Virus,	10 ⁻¹ dilution	Cytotoxicity	Complete inactivation	4.75	
	Strain Long (ATCC VR-26)	10 ⁻² to 10 ⁻⁷ dilution	Complete inactivation	Complete inactivation		
		Log ₁₀ TCID ₅₀ /carrier	≤1.50	≤1.50*		
		Log Reduction	≥3.25	≥3.25		
50282545	Human	10 ⁻¹ dilution	Cytotoxicity	Cytotoxicity	5.50	
	Immunodeficiency	10 ⁻² to 10 ⁻⁷	Complete	Complete		
	Virus Type 1, Strain HTLV-III _B (Advanced	dilution Log ₁₀ TCID ₅₀ /carrier	inactivation ≤1.50	inactivation ≤1.50		

MRID	Organism	Description	Res	ults			Dried Virus	
				PDI-0061- LO-938- 112-A1		-0061- 938- -A2	Control (Log₁₀ TCID₅₀/carrier)	
		5 minutes, RT	U, 5%	soil loa	ad			
	Biotechnologies, Inc.)	Log Reduction	≥4.0	0	≥4.0	00		
50282539	Feline Calicivirus,	Replicate	1	2	1	2	1	2
	Strain F-9 (ATCC	10 ⁻¹ dilution	Т	T	T	T	5.79356	6.05894
	VR-782)	10 ⁻² dilution	Т	0	T	T		
75 de 2000 de 2000		10 ⁻³ to 10 ⁻⁴ dilution	0	0	0	0		
		Log ₁₀ TCID ₅₀ /carrier	≤2.5	0	≤2.5	50		
		Log Reduction (MPN)	≥3.5	5			-	
50282541	Duck Hepatitis B	Replicate	1	2	1	2	1	2
	Virus, Strain 11/4/12	10 ⁻¹ to 10 ⁻⁴ dilution	0	0	0	0	5.55827	5.05894
	(Hepadnavirus Testing, Inc.)	Log ₁₀ TCID ₅₀ /carrier	≤0.5	≤0.50		50	The same of the sa	
		Log Reduction (MPN)	≥5.3	1				
50282543	Bovine Viral	Replicate	1	2	1	2	1	2
	Diarrhea Virus,	10 ⁻¹ dilution	0	0	Т	T	4.55828	4.79357
	Strain Oregon C24v-genotype 1	10 ⁻² to 10 ⁻⁴ dilution	0	0	0	0		
	(National Veterinary Services	Log ₁₀ TCID ₅₀ /carrier	≤0.5	≤0.50		50		
- O. tala.	Laboratories)	Log Reduction (MPN)	≥3.9	6				

T = Cytotoxicity; 0 = Complete inactivation
*Cytotoxicity was observed at the 10⁻¹ dilution in the cytotoxicity and neutralization confirmation controls, but not in the test.

MRID	Organism	Description	Results		Dried Virus	
			PDI-0061- LO-938- 148A	PDI-0061- LO-938- 148B	Control (Log₁₀ TCID₅₀/carrier)	
			J, 5% soil load			
50282530	Rhinovirus Type	10 ⁻¹ dilution	Cytotoxicity		5.50	
	1A, Strain 2060	10 ⁻² to 10 ⁻⁸	Complete	==		
	(ATCC VR-1559)	dilution	inactivation			
		Log ₁₀ TCID ₅₀ /carrier	≤1.50			
		Log Reduction	≥4.00			
50282532	Rotavirus, Strain	10 ⁻¹ dilution		Cytotoxicity	6.50	
	WA (ATCC VR- 2018)	10 ⁻² to 10 ⁻⁸ dilution		Complete inactivation		
		Log ₁₀ TCID ₅₀ /carrier		≤1.50		
		Log Reduction		≥5.00		
50282534	Herpes Simplex Virus Type 2,	10 ⁻¹ to 10 ⁻⁸ dilution		Complete inactivation	5.25	
	Strain G (ATCC VR-734)	Log ₁₀ TCID/carrier		≤0.50		
		Log Reduction	77.0	≥4.75		
50282536	Influenza A Virus	10 ⁻¹ dilution	Cytotoxicity	-	4.50	
	(H3N2), Strain A/HongKong/8/68	10 ⁻² to 10 ⁻⁸ dilution	Complete inactivation			
	(ATCC VR-544)	Log ₁₀ TCID ₅₀ /carrier	≤1.50	-		
		Log Reduction	≥3.00			
50282538	Respiratory	10 ⁻¹ dilution		Cytotoxicity	5.00	
- 10-10-10-10-10-10-10-10-10-10-10-10-10-1	Syncytial Virus,	10 ⁻² to 10 ⁻⁶		Complete		
	Strain Long	dilution		inactivation		
	(ATCC VR-26)	Log ₁₀ TCID ₅₀ /carrier		≤1.50		
		Log Reduction		≥3.50		
50282546	Human Immunodeficiency	10 ⁻¹ to 10 ⁻² dilution		Cytotoxicity	5.50	
	Virus Type 1, Strain HTLV-III _B	10 ⁻³ to 10 ⁻⁷ dilution	42.02%	Complete inactivation		
	(Advanced Biotechnologies,	Log ₁₀ TCID ₅₀ /carrier		≤2.50		
	Inc.)	Log Reduction		≥3.00		
50282540		Replicate	1 2		1 2	

MRID	Organism	Description	Res	ults		Dried Virus		
	PDI-0061- LO-938- 148A		PDI-0061- LO-938- 148B					
		1 minute, RTU	J, 5%	soil load	d			
	Feline Calicivirus, Strain F-9 (ATCC	10 ⁻¹ to 10 ⁻⁴ dilution	0	0		5.79356	6.37893	
	VR-782)	Log ₁₀ TCID ₅₀ /carrier	≤0.5	0				
		Log Reduction (MPN)	>6.0	9				
50282542	Duck Hepatitis B	Replicate	1	2		1	2	
	Virus, Strain 11/4/12	10 ⁻¹ to 10 ⁻⁴ dilution	0	0		5.37983	5.05894	
	(Hepadnavirus Testing, Inc.)	Log ₁₀ TCID ₅₀ /carrier	≤0.5	0				
	20000	Log Reduction (MPN)	≥5.2	2				
50282544	Bovine Viral Diarrhea Virus, Strain Oregon	Lot		-0061- 1003-				
	C24v-genotype 1	Replicate	1	2		1	2	
	(National Veterinary	10 ⁻² to 10 ⁻³ dilution	Т	Т		7.67	7.55	
	Services Laboratories)	10 ⁻⁴ to 10 ⁻⁷ dilution	0	0				
	*	Log ₁₀ TCID ₅₀ /carrier	≤4.4	2				
		Log Reduction (MPN)	≥3.1	9				

T = Cytotoxicity; 0 = Complete inactivation

Disinfection - Tuberculocidal Efficacy, Mycobacterium bovis BCG (Organon Teknika)

MRID	Lot		Mediun	n	Carrier
		MPB	7H9	KM	Control Count (Average CFU/Carrier)
	5 minute o	contact time	, 5% soil load, 9	00 day incubatio	n
50282547	PDI-0061-LO- 938-112-A1	0/10	0/10	0/10	5.60
PDI-0061	PDI-0061-LO- 938-112-A2	0/10	0/10	0/10	
	1 minute d	contact time	, 5% soil load, 9	00 day incubatio	n
50282548	PDI-0061-LO- 938-148A	0/10	0/10	0/10	5.04
	PDI-0061-LO- 938-148B	0/10	0/10	0/10	

Disinfection - Fungicidal Efficacy

MRID	Organism	No. Exhibiting Grov	wth/Total No. Tested	Average
(Test Date)		PDI-0061-LO-938- 112-A1 PDI-0061-LO-938 112-A2		log ₁₀ CFU/Carrier
	5 min	ute contact time, RTU,	5% soil load	ET William and Mac
50282549	Trichophyton mentagrophytes (ATCC 9533)	1° = 0/10 2° = 0/10	1° = 0/10 2° = 0/10	5.12
50282551 (12/31/15)	Candida albicans (ATCC	0/10	0/10	<3.30*
(1/12/16)	10231)	0/10	0/10	4.27

^{*}Test was repeated due to a carrier population control failure.

MRID	Organism	No. Exhibiting Grov	Average		
	-	PDI-0061-LO-938- 148A PDI-0061-LO-938		log ₁₀ CFU/Carrier	
	1 min	ute contact time, RTU,	5% soil load		
50282550	Trichophyton mentagrophytes (ATCC 9533)	1° = 0/10 2° = 0/10		4.99	
50282552	Candida albicans (ATCC 10231)		0/10	4.77	

<u>Disinfection - Sporicidal Efficacy - Spores of Clostridium difficile (ATCC 43598)</u>

MRID	50282553	50282554	50282555
Spore titer (spores/mL)	5.3 x 10 ⁸	7.1 x 10 ⁸	7.1 x 10 ⁸
Spore purity	99%	99%	99%
Acid resistance (log reduction)	0.73	0.66	0.66
Batch	PDI-0061- MRC-938-100A	PDI-0061-LO- 938-120-B	PDI-0061-LO- 938-128A
Test Date	10/22/15	1/20/16	2/16/16
5 minute cont	act time, RTU, 3-pa	art soil load	
Control Average Log ₁₀ CFU/carrier	6.26	6.40	6.36
Test Average Log ₁₀ CFU/carrier	<0.00	<0.17	<0.29*
Log reduction	>6.26	>6.23	>6.07
			1

^{*}Values for geometric mean of test carriers and average log₁₀ are reversed in test report.

V STUDY CONCLUSIONS

MRIDs	Claim	Surface Type	Application Method(s) and Dilution	Contact Time	Soil load	# Lots	Organism(s)	Data support tested conditions?
50282510 50282511 50282513	Disinfectant, bactericidal	Hard, non- porous surfaces	Spray, RTU	5 minutes	5%	3	 Staphylococcus aureus (ATCC 6538) Pseudomonas aeruginosa (ATCC 15442) Salmonella enterica (ATCC 10708) 	Yes
50282515 50282517 50282519 50282521 50282523 50282525	Disinfectant, bactericidal	Hard, non- porous surfaces	Spray, RTU	5 minutes	5%	2	 Multi-drug Resistant (MDR) Acinetobacter baumannii (ATCC 19606) Carbapenem Resistant Klebsiella pneumoniae (ATCC BAA-1705) Extended-Spectrum betalactamase (ESBL) producing Escherichia coli (ATCC BAA-196) Methicillin Resistant Staphylococcus aureus (MRSA) (ATCC 33592)\ New Delhi metallo-betalactamase 1 (NDM-1) producing Enterobacter cloacae (CDC 1000654) Vancomycin resistant Enterococcus faecalis (VRE) (ATCC 51575) 	Yes

MRIDs	Claim	Surface Type	Application Method(s) and Dilution	Contact Time	Soil load	# Lots	Organism(s)	Data support tested conditions?
50282509 50282512 50282514	Disinfectant, bactericidal	Hard, non- porous surfaces	Spray, RTU	1 minute	5%	2	 Staphylococcus aureus (ATCC 6538) Pseudomonas aeruginosa (ATCC 15442) Salmonella enterica (ATCC 10708) 	Yes
50282516 50282518 50282520 50282522 50282524 50282526	Disinfectant, bactericidal	Hard, non- porous surfaces	Spray, RTU	1 minute	5%	1	 Multi-drug Resistant (MDR) Acinetobacter baumannii (ATCC 19606) Carbapenem Resistant Klebsiella pneumoniae (ATCC BAA-1705) Extended-Spectrum betalactamase (ESBL) producing Escherichia coli (ATCC BAA-196) Methicillin Resistant Staphylococcus aureus (MRSA) (ATCC 33592) New Delhi metallo-betalactamase 1 (NDM-1) producing Enterobacter cloacae (CDC 1000654) Vancomycin resistant Enterococcus faecalis (VRE) (ATCC 51575) 	Yes
50282527	Disinfectant, virucidal	Hard, non- porous surfaces	Spray, RTU	5 minutes	5%	3	Adenovirus Type 5, Strain Adenoid 75 (ATCC VR-5)	Yes

MRIDs	Claim	Surface Type	Application Method(s) and Dilution	Contact Time	Soil load	# Lots	Organism(s)	Data support tested conditions?
50282529 50282531 50282535 50282537 50282539 50282541 50282543 50282545	Disinfectant, virucidal	Hard, non- porous surfaces	Spray, RTU	5 minutes	5%	2	 Rhinovirus Type 1A, Strain 2060 (ATCC VR-1559) Rotavirus, Strain WA (ATCC VR-2018) Herpes Simplex Virus Type 2, Strain G (ATCC VR-734) Influenza A Virus (H3N2), Strain A/HongKong/8/68 (ATCC VR-544) Respiratory Syncytial Virus, Strain Long (ATCC VR-26) Feline Calicivirus, Strain F-9 (ATCC VR-782) Duck Hepatitis B Virus, Strain 11/4/12 (Hepadnavirus Testing, Inc.) Bovine Viral Diarrhea Virus, Strain Oregon C24v-genotype 1 (National Veterinary Services Laboratories) Human Immunodeficiency Virus Type 1, Strain HTLV-III_B (Advanced Biotechnologies, Inc.) 	Yes
50282528	Disinfectant, virucidal	Hard, non- porous surfaces	Spray, RTU	1 minute	5%	2	Adenovirus Type 5, Strain Adenoid 75 (ATCC VR-5)	Yes

MRIDs	Claim	Surface Type	Application Method(s) and Dilution	Contact Time	Soil load	# Lots	Organism(s)	Data support tested conditions?
50282530 50282532 50282534 50282536 50282540 50282542 50282546	Disinfectant, virucidal	Hard, non- porous surfaces	Spray, RTU	1 minute	5%	1	 Rhinovirus Type 1A, Strain 2060 (ATCC VR-1559) Rotavirus, Strain WA (ATCC VR-2018) Herpes Simplex Virus Type 2, Strain G (ATCC VR-734) Influenza A Virus (H3N2), Strain A/HongKong/8/68 (ATCC VR-544) Respiratory Syncytial Virus, Strain Long (ATCC VR-26) Feline Calicivirus, Strain F-9 (ATCC VR-782) Duck Hepatitis B Virus, Strain 11/4/12 (Hepadnavirus Testing, Inc.) Human Immunodeficiency Virus Type 1, Strain HTLV-III_B (Advanced Biotechnologies, Inc.) 	Yes
50282544	Disinfectant, virucidal	Hard, non- porous surfaces	Spray, RTU	1 minute	5%	1	Bovine Viral Diarrhea Virus, Strain NADL (American BioResearch Lab)	No ¹
50282549 50282551	Disinfectant, fungicidal	Hard, non- porous surfaces	Spray, RTU	5 minutes	5%	2	 Trichophyton mentagrophytes (ATCC 9533) Candida albicans (ATCC 10231) 	Yes

MRIDs	Claim	Surface Type	Application Method(s) and Dilution	Contact Time	Soil load	# Lots	Organism(s)	Data support tested conditions?
50282550 50282552	Disinfectant, fungicidal	Hard, non- porous surfaces	Spray, RTU	1 minute	5%	1	 Trichophyton mentagrophytes (ATCC 9533) Candida albicans (ATCC 10231) 	Yes
50282547	Disinfectant, tuberculocidal	Hard, non- porous surfaces	Spray, RTU	5 minutes	5%	2	Mycobacterium bovis BCG (Organon Teknika)	Yes
50282548	Disinfectant, tuberculocidal	Hard, non- porous surfaces	Spray, RTU	1 minute	5%	2	Mycobacterium bovis BCG (Organon Teknika)	Yes
50282553 50282554 50282555	Disinfectant with sporicidal activity	Hard, non- porous surfaces	Spray, RTU	5 minutes	5%	3	Clostridium difficile – spore form (ATCC 43598)	Yes

^{1.} The study report did not clearly describe the neutralization procedure, particularly the use of Sephacryl columns. In addition, a high level of cytotoxicity was observed (out to the 10⁻³ dilution), which prevents observation of test substance efficacy in several serial dilutions. As a batch replication study, the study is not supported by the tested conditions in MRID 50282543 because a different strain of the virus was used in testing, and several conditions of testing were changed between the two studies including the neutralization procedure, indicator cell type, and test medium.

VI LABEL COMMENTS

Label Date/Identification Number: Proposed label PDI/9480-XX/labels/2017/9480-XX label 041817.doc, dated April 26, 2017

1. The proposed label claims that the ready-to-use spray product, Project Flash Spray, is an effective hospital disinfectant with bactericidal activity in the presence of 5% organic soil on hard, non-porous surfaces at a 1 minute contact time against the following:

Staphylococcus aureus (ATCC 6538)

Pseudomonas aeruginosa (ATCC 15442)

Salmonella enterica (ATCC 10708)

Multi-drug Resistant (MDR) Acinetobacter baumannii (ATCC 19606)

Carbapenem Resistant Klebsiella pneumoniae (ATCC BAA-1705)

Extended-Spectrum beta-lactamase (ESBL) producing *Escherichia coli* (ATCC BAA-196)

Methicillin Resistant Staphylococcus aureus (MRSA) (ATCC 33592)

New Delhi metallo-beta-lactamase 1 (NDM-1) producing *Enterobacter cloacae* (CDC 1000654)

Vancomycin resistant Enterococcus faecalis (VRE) (ATCC 51575)

These claims are acceptable as they are supported by the submitted data.

 The proposed label claims that the ready-to-use spray product, Project Flash Spray, is an effective hospital disinfectant with virucidal activity in the presence of 5% organic soil on hard, non-porous surfaces at a 1 minute contact time against the following:

Adenovirus Type 5, Strain Adenoid 75 (ATCC VR-5)

Rhinovirus Type 1A, Strain 2060 (ATCC VR-1559)

Rotavirus, Strain WA (ATCC VR-2018)

Herpes Simplex Virus Type 2, Strain G (ATCC VR-734)

Influenza A Virus (H3N2), Strain A/HongKong/8/68 (ATCC VR-544)

Respiratory Syncytial Virus, Strain Long (ATCC VR-26)

Feline Calicivirus, Strain F-9 (ATCC VR-782), surrogate for Norovirus

Duck Hepatitis B Virus, Strain 11/4/12 (Hepadnavirus Testing, Inc.), surrogate for Human Hepatitis B Virus

Human Immunodeficiency Virus Type 1, Strain HTLV-III_B (Advanced Biotechnologies, Inc.)

These claims are acceptable as they are supported by the submitted data.

3. The proposed label claims that the ready-to-use spray product, Project Flash Spray, is an effective hospital disinfectant with virucidal activity in the presence of 5% organic soil on hard, non-porous surfaces at a 1 minute contact time against the following:

Bovine Viral Diarrhea Virus, Strain Oregon C24v-genotype 1 (National Veterinary Services Laboratories), surrogate for Human Hepatitis C Virus

These claims are <u>not acceptable</u> based on the submitted data. Claims and directions for use against this organism or the organism for which it is a surrogate should be removed or changed to a 5-minute contact time.

The complete study described in MRID 50282543 supports the proposed label claim at a 5 minute contact time, however the batch replication study described in MRID 50282544 does not support the same claim at a 1 minute contact time. The study report in MRID 50282544 did not clearly describe the neutralization procedure, particularly the use of Sephacryl columns. In addition, a high level of cytotoxicity was observed (out to the 10-3 dilution), which prevents observation of test substance efficacy in several serial dilutions. As a batch replication study, the study is not supported by the tested conditions in MRID 50282543 because a different strain of the virus was used in testing, and several conditions of testing were changed between the two studies including the neutralization procedure, indicator cell type, and test medium.

4. The proposed label claims that the ready-to-use spray product, Project Flash Spray, is an effective hospital disinfectant with fungicidal activity in the presence of 5% organic soil on hard, non-porous surfaces at a 1 minute contact time against the following:

Trichophyton interdigitale, tested as Trichophyton mentagrophytes (ATCC 9533) Candida albicans (ATCC 10231)

These claims are acceptable as they are supported by the submitted data.

5. The proposed label claims that the ready-to-use spray product, Project Flash Spray, is an effective hospital disinfectant with tuberculocidal activity in the presence of 5% organic soil on hard, non-porous surfaces at a 1 minute contact time against the following:

Mycobacterium bovis BCG (Organon Teknika)

These claims are <u>acceptable</u> as they are supported by the submitted data.

6. The proposed label claims that the ready-to-use spray product, Project Flash Spray, is an effective hospital disinfectant with sporicidal activity in the presence of 5% organic soil on hard, non-porous surfaces at a 5 minute contact time against the following:

Clostridium difficile – spore form (ATCC 43598)

These claims are acceptable as they are supported by the submitted data.

7. The proposed label claims that the product, Project Flash Spray, qualifies for the following emerging viral pathogens claims as described in the letter from the applicant to EPA dated July 17, 2017:

For an emerging viral pathogen	follow the directions for use for the
that is a/an	following organisms on the label:
Enveloped virus	One of the following:
	Adenovirus Type 5, Strain Adenoid 75 (ATCC VR-5)
	Rotavirus, Strain WA (ATCC VR-2018)
	Rhinovirus Type 1A, Strain 2060 (ATCC VR- 1559)
	Feline Calicivirus, Strain F-9 (ATCC VR-782)
Large, non-enveloped virus	One of the following:
	Rhinovirus Type 1A, Strain 2060 (ATCC VR-1559)
	Feline Calicivirus, Strain F-9 (ATCC VR-782)
Small, non-enveloped virus	Two of the following:
× ,	Rhinovirus Type 1A, Strain 2060 (ATCC VR-1559)
	Feline Calicivirus, Strain F-9 (ATCC VR-782)

These claims are <u>acceptable</u>, <u>however</u> the following changes should be made to the supporting documentation:

Label: The language on page 7 of the proposed label and should be revised to exactly match the following:

"Emerging Viral Pathogens Claims

This product qualifies for emerging viral pathogen claims per the EPA's 'Guidance to Registrants: Process for Making Claims Against Emerging Viral Pathogens not on EPA-Registered Disinfectant Labels' when used in accordance with the appropriate use directions indicated below.

This product meets the criteria to make claims against certain emerging viral pathogens from the following viral category[ies]:

- Enveloped Viruses
- Large, Non-Enveloped Viruses
- Small, Non-Enveloped Viruses

For an emerging viral pathogen	follow the directions for use for the
that is a/an	following organisms on the label:
Enveloped virus	Adenovirus Type 5, Strain Adenoid 75 (ATCC VR-5)
	Rotavirus, Strain WA (ATCC VR-2018)
	Rhinovirus Type 1A, Strain 2060 (ATCC VR- 1559)
	Feline Calicivirus, Strain F-9 (ATCC VR-782)
Large, non-enveloped virus	Rhinovirus Type 1A, Strain 2060 (ATCC VR- 1559)
	Feline Calicivirus, Strain F-9 (ATCC VR-782)
Small, non-enveloped virus	Rhinovirus Type 1A, Strain 2060 (ATCC VR-
	1559)
	Feline Calicivirus, Strain F-9 (ATCC VR-782)

Acceptable claim language:

[Product name] has demonstrated effectiveness against viruses similar to [name of emerging virus] on hard, [porous and/or non-porous surfaces]. Therefore, [product name] can be used against [name of emerging virus] when used in accordance with the directions for use against [name of supporting virus(es)] on [hard, porous/non-porous surfaces]. Refer to the [CDC or OIE] website at [pathogen-specific website address] for additional information.

[Name of illness/outbreak] is caused by [name of emerging virus]. [Product name] kills similar viruses and therefore can be used against [name of emerging virus] when used in accordance with the directions for use against [name of supporting virus(es)] on [hard, porous/non-porous surfaces]. Refer to the [CDC or OIE] website at [website address] for additional information."

Terms of Registration Letter: The letter from the applicant to EPA dated July 17, 2017 should be revised to include:

- All the terms of registration described in Attachment 1 of EPA's emerging viral pathogens guidance (see page 6). The language in the letter should exactly match the four numbered paragraphs in the guidance, except where the product name and/or surface type can be more specific.
- The above table of emerging virus types and corresponding supporting viruses on the label. Enveloped viruses should not appear in the terms of registration letter as tested viruses must be large or small non-enveloped viruses to support claims against emerging pathogens (see Section III on page 3 of the guidance).
- 8. Make the following changes to the proposed label:

 - b. Pages 2-4:

 i. Remove "[treated]" from all directions for use and specify the surface should remain visibly wet throughout the contact time.

- c. Page 4: i. Specify hard, non-porous surfaces for the "Areas of Use" section. d. Page 6: i. Change "Multi-Drug" to "Antibiotic" in the heading "Multi-Drug Resistant Bacteria." Not all of the listed organisms are considered multi-drug resistant. e. Pagé 7: i. Change "Herpes Simplex type 2" to "Herpes Simplex Virus type 2." √ii. Remove specific claims against Pandemic 2009 H1N1 Influenza A virus. This product was not tested against this virus, although it is commercially available for efficacy testing Page 8: f. i. Remove "[Herpicidal*]." The agency has not defined this term. = ii. Change "99.99%" to "99.9%." The studies supporting claims against bacteria were qualitative studies that do not provide an exact quantitative measure of organism reduction and thus do not support a 4-log (99.99%) reduction in the numbers of these organisms. √ iii. Remove "[tough-to-kill]."
- g. Page 9:

organisms.

- i. Remove "[Herpicidal*]." See Label Comment 8.f.i.
- ii. Remove "[quickly] [fast]." These terms only apply to products that are effective in 30 seconds or less.
- √iii. Remove the claim "[Kills] [Effective against] ESKAPE bacteria [in 1 [one] minute]." Enterococcus faecium is one of the ESKAPE bacteria, but does not appear on the label (Enterococcus faecalis is a different organism.)

/iv. Remove "bathroom" from the claim "Effective against bathroom bacteria

and viruses" or revise the claim. The agency has not defined "bathroom"

- iv. Remove "[household] [exterior toilet surface] [bathroom]" from the claim "Kills [household] [exterior toilet surface] [bathroom] germs" or revise the claim. The agency has not defined "household", "exterior toilet surface", or "bathroom" organisms.
- h. Page 10:
 - i. Change "Surface disinfectant" to "Hard, non-porous surface disinfectant."